

REMARKS

Claims 1-29 are pending in the action. Claims 2-4, 6-7, 11-12, 23 and 25 have been amended. Claims 7, 8 and 25 have been re-written in independent form. New claims 27-29 have been added.

The Office Action states that claims 12, 13, 14, 16 and 18 have been objected to because of minor informalities. Claim 12 has been amended to delete the duplicate comma after "platform". As such, the Applicant believes that these claims are now allowable.

The Office further rejects claims 10, 11, 23 and 26 pursuant to 35 U.S.C. §103(b) as being anticipated by U.S. Patent No. 5,389,476 to Kruchko. The Applicant respectfully disagrees and traverses this rejection.

The Kruchko reference discloses a system for a method of producing life sized decals. In Kruchko, a digitized image 28 is enlarged and processed. The digitized image is developed into a film negative image which is substantially the same size as the original image. Registration marks are added to the film negative image to form registration lines on the negative image for dividing the image. The film negative image is divided into image sections and printed onto a medium. Depending upon the size of the image the image sections can be printed onto a single sheet (Figure 3A) or multiple sheets (Figure 3B), wherein the sheets are printing plates (see col. 4, lines 61- 65).

The method described in Kruchko represents the prior art disclosed in the present invention, wherein image sections are printed on separate single sized sheets or printing plates (see e.g., page 2, lines 5-9). In vast contrast, in the present invention, a single image is printed onto a single print substrate, wherein the single print substrate, not the image, is constructed from smaller *print substrates*. Indeed, Kruchko does not teach or suggest that the printing plates, that is the print

substrates, are made from smaller print plates, nor does the undersigned believe that the printing plates could physically be constructed of smaller print plates.

The Applicant believes that the Office is asserting that the print segments are equivalent to the image sections. This is not true. In Kruchko, the image itself is being divided into image sections. Each of these image sections is being printed upon a unitary print plate. The print segments of the present invention are the materials upon which the image is printed, wherein the image sections are the segments of the divided image which are being printed. These are physically different and distinct elements.

Further, the Office states that Kruchko teaches “the printing of the image onto a preassembled single print substrate”. The Applicant asserts that the Office has inappropriately read Kruchko onto this limitation. The claim language clearly uses antecedent basis to refer to the print substrate. It is not “any” or a new print substrate, but rather refers back to the substrate that has been assembled from “a plurality of smaller print substrates”. The rejection, in total, seems to imply that the single print substrate is the image, and that the image is printed onto the “preassembled single print substrate”. By this logic, the image has been printed onto itself. This is an inconsistent reading of the reference with respect to the claim language.

Additionally, Office states that “delivering the printed substrate to the client” is an inherent step in the Kruchko method. As the Kruchko method are creating life size decals which are printed in sections onto printing plates, the image must be printed onto a print medium. In this regard, the image on the printing plate (the printed substrate) is transferred to a clear medium sheet prior to the delivery to the client. The printing plates, that is, the “printed substrates” are *not* delivered to the

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client, and thus, this is not an inherent step in this method.

It is clear from above that the Kruchko reference fails to meet the claim limitations of claim 10. In particular, Kruchko fails to meet, in part, the limitations of “assembling a single print substrate”, “printing the limitations image onto the preassembled substrate” and “delivering the printed substrate to the client.”

With regard to claims 11 and 26, the Office states that the print substrate of Kruchko comprises “coupling a smaller laminated segment”. The Applicant refers to the arguments above, wherein the print substrate of Kruchko is not composed of smaller segments, rather the image is divided into segments. Further as amended, claim 11 “requires the attachment member be coupled “along at least one edge” of the single substrate. The laminated backing of the segment fails to meet this requirement. The Office has failed to indicate why claim 23 is not allowable pursuant to this reference, and thus, the Applicant is unclear as to why the claim has been rejected.

In light of the above arguments, the Applicant contends that claims 10, 11, 23 and 26 are allowable. As such, the Applicant respectfully requests the Office withdraw this rejection.

The Office further rejects claims 1-3 pursuant to 35 U.S.C. §103(b) as being anticipated by U.S. Patent No. 6,059,391 to Fulkerson et al. The Applicant respectfully disagrees and traverses the rejection. However, to expedite prosecution of this application, the Applicant has cancelled claim 1 without prejudice. As such, this rejection is moot. Further, claims 2 and 3 have been amended to depend from new claim 27. New claim 27 recites a track comprising “a rail having a groove”. As the Fulkerson reference fails to teach this limitation, the independent claim is allowable, and thus, claims 2 and 3 as amended are now allowable.

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The Office Action further rejects claims 4-6 under as 35 U.S.C. §103(a) being unpatentable over Fulkerson in view of U.S. Patent No. 5,887,519 to Zelko. The Applicant respectfully disagrees and traverses the rejection.

The Zelko reference is directed to a “screen printing machine [having] a drive mechanism for moving printing platens along an endless horizontal path through successive printing stations.” The Zelko device includes a “platen alignment mechanism at each printing station.” To secure the platen, a clamp is pressed into engagement with a reinforcement rail 44. See col. 4, lines 56-64.

Claim 4 requires that the platform comprises “a clamping device and an expandable member, wherein the clamping device is coupled to the expandable member.” In the Zelko device, a platen alignment mechanism aligns each platen by vertical displacement of an alignment bar. See col. 2, lines 5-10. Assuming arguendo that the alignment mechanism is the expandable member recited in the claim, this feature fails to meet the limitation of the claim as it does not comprise the platform. Rather, it is a part of the “support bar 54” and is a means by which to adjust the height of the screen frame 28. Further it is not coupled to the clamp 28.

With regard to claim 6, the Office states that Fulkerson teaches a “rectangular member under the platform which contacts the platform during operation and linearly translates the platform along the track.” The Applicant respectfully disagrees with this statement of operation.

In Fulkerson, the palette 14 “is coupled to a threaded drive shaft 20 and slideably secured onto a pair of parallel tracks 22 engaged with a block . . . *so that the palette 14 is moveable . . . in response to rotation of the threaded worm drive shaft 20.*” The Fulkerson reference states clearly

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that the translation of the palette is in direct response to the “rotation of the threaded worm drive shaft 20”. The rectangular box merely secures the tracks 22. The rectangular box, however, does not cause the movement of the palette. As such, the Fulkerson reference fails to teach this limitation and thus, does not render this claim obvious. In light of the arguments set forth above, the Applicant believes that the claims are allowable and respectfully requests the Office to withdraw its rejection.

Finally, the Office rejects claims 19 and 20 under 35 U.S.C. §103(a) being unpatentable over Kruchko in view of Fulkerson. The Applicant respectfully disagrees and traverses the rejection.

The Applicant refers to the arguments set forth above regarding the Kruchko reference. Applying the above arguments to claim 19, which is similar to claim 10, illustrates that claim 19 is not anticipated by Kruchko. Thus, claim 20, which depends from 19, is also allowable.

The Examiner states that claims 9, 15, 17, 21, 22 and 24 are allowable, and further states that claims 7, 8 and 25 are objected as being dependent upon a rejected claim base, but are allowable if re-written in independent form. The Applicant thanks the Examiner. The Applicant has re-written claims 7, 8 and 25 in independent form and thus, contends that these claims are now in allowable form.

Claims 27-29 have been added. New claim 27 is directed to a printing system wherein the track comprises “a rail having a groove.” Claims 28 and 29 are directed to a transport mechanism that moves the platform. None of these elements are found in the cited references.

Finally, Applicant has amended the specification to correct a reference to Figure 2. No new matter has been added.

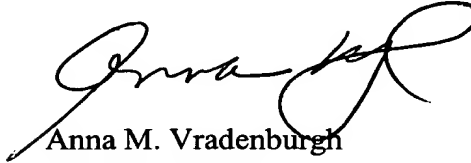
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The Applicant believes that the claims are now in condition for allowance. As such, the Applicant respectfully requests that the Office withdraw the rejections and pass the claims onto allowance.

Respectfully submitted,

Dated:

May 3, 2004

A handwritten signature in black ink, appearing to read "Anna M. Vradenburgh", written in a cursive style.

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AMV/sd

Enclosures: Request for Ext of Time